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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KACY BURKE,

Plaintiff,

vs.

PROFESSIONAL BULLRIDERS, LLC, a  
Foreign Limited-Liability Company, DOES I-  
X; ROE CORPORATIONS I-X.

Defendants.

Case No.: 2:20-cv-00558-JAD-VCF

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED by and between Plaintiff KACY BURKE ("Plaintiff"), through her counsel, HKM Employment Attorneys, Defendant, PROFESSIONAL BULLRIDERS, LLC, ("Defendant" or "PBR"), by and through its counsel, Jackson Lewis P.C., that Defendant shall have a 30-day extension up to and including May 15, 2020, in which to file its respective response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed her Complaint on March 20, 2020. ECF No. 1. Defendant was served with the Complaint on March 25, 2020.

2. Defendant's response to the Complaint is currently due on April 15, 2020.

3. Due to the press of other matters, including adjustments made necessary by the COVID-19 pandemic, and in order to investigate and respond to the Plaintiff's allegations in Plaintiff's Complaint, counsel for Defendant require additional time. Counsel for Defendant

1 request a thirty (30) day extension, up to and including May 15, 2020, to file their respective  
2 responses to Plaintiff's Complaint.

3 4. This is the first request for an extension of time for Defendant to file a response to  
4 Plaintiff's Complaint.

5 5. This request is made in good faith and not for the purpose of delay.  
6 Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as  
7 waiving any claim and/or defense held by any party.

8 Dated this 9<sup>th</sup> day of April, 2020

9 HKM EMPLOYMENT ATTORNEYS

JACKSON LEWIS P.C.

10  
11 /s/ Martha D. Kurshumova  
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27 *Attorneys for Defendant*  
28 *Professional Bullriders, LLC*

ORDER

IT IS SO ORDERED.



United States Magistrate Judge  
4-10-2020

Dated: \_\_\_\_\_